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FILED IN THE
U.S. DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

APR - 1 2021

SEAN F. McAVOY, CLERK
DEPUTY
RICHLAND, WASHINGTON

8 UNITED STATES DISTRICT COURT
9 FOR THE EASTERN DISTRICT OF WASHINGTON

10 UNITED STATES OF AMERICA,

11 Plaintiff,

4:20-CR-06009-SMJ-1

12 v.

Plea Agreement

13
14 JUAN CARLOS SANDOVAL-
15 GUERRERO,

16 Defendant.

17
18 Plaintiff, United States of America, by and through Joseph H. Harrington,
19 Acting United States Attorney for the Eastern District of Washington, and Alison
20 L. Gregoire Assistant United States Attorney for the Eastern District of
21 Washington, and Defendant JUAN CARLOS SANDOVAL-GUERRERO and the
22 Defendant's counsel, Jeremy Sporn, agree to the following Plea Agreement:

23 1. Guilty Plea and Maximum Statutory Penalties:

24 The Defendant, JUAN CARLOS SANDOVAL-GUERRERO, agrees to
25 plead guilty to Count 1 of the Indictment in this case charging the Defendant with
26 Production of Child Pornography, and Attempt, in violation of 18 U.S.C. §
27 2251(a), (e).
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1 The Defendant understands that the charge of Production of Child
2 Pornography, and Attempt in violation of 18 U.S.C. § 2251(a), (e), carries a
3 maximum penalty of not less than fifteen years nor more than thirty years
4 imprisonment, a fine not to exceed \$250,000; a term of supervised release of not
5 less than 5 years up to life; a \$100 special penalty assessment; and a \$5,000 special
6 assessment pursuant to the Justice for Victims of Trafficking Act of 2015, unless
7 the Court finds the Defendant to be indigent. Pursuant to the Amy, Vicky and
8 Andy Child Pornography Victim Assistance Act of 2018, 18 U.S.C. § 2259A, upon
9 conviction, in addition to any other criminal penalty, restitution, or special
10 assessment authorized by law, the court shall assess an additional special penalty
11 assessment of no more than \$50,000

12 The Defendant, JUAN CARLOS SANDOVAL-GUERRERO, understands
13 that a violation of a condition of supervised release carries an additional penalty of
14 re-imprisonment for all or part of the term of supervised release without credit for
15 time previously served on post-release supervision.

16 2. The Court is Not a Party to the Agreement:

17 The Court is not a party to this Plea Agreement and may accept or reject this
18 Plea Agreement. Sentencing is a matter that is solely within the discretion of the
19 Court. The Defendant understands that the Court is under no obligation to accept
20 any recommendations made by the United States and/or by the Defendant; that the
21 Court will obtain an independent report and sentencing recommendation from the
22 U.S. Probation Office; and that the Court may, in its discretion, impose any
23 sentence it deems appropriate up to the statutory maximums stated in this Plea
24 Agreement.
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26 The Defendant acknowledges that no promises of any type have been made
27 to the Defendant with respect to the sentence the Court will impose in this matter.
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1 The Defendant understands that the Court is required to consider the applicable
2 sentencing guideline range, but may depart upward or downward under the
3 appropriate circumstances.

4 3. Waiver of Constitutional Rights:

5 The Defendant, JUAN CARLOS SANDOVAL-GUERRERO, understands
6 that by entering this plea of guilty the Defendant is knowingly and voluntarily
7 waiving certain constitutional rights, including:

- 8 (a). The right to a jury trial;
9 (b). The right to see, hear and question the witnesses;
10 (c). The right to remain silent at trial;
11 (d). The right to testify at trial; and
12 (e). The right to compel witnesses to testify.

13 While the Defendant is waiving certain constitutional rights, the Defendant
14 understands the Defendant retains the right to be assisted through the sentencing
15 and any direct appeal of the conviction and sentence by an attorney, who will be
16 appointed at no cost if the Defendant cannot afford to hire an attorney. The
17 Defendant also acknowledges that any pretrial motions currently pending before
18 the Court are waived.

19 4. Elements of the Offense:

20 The United States and the Defendant agree that in order to convict the
21 Defendant of Attempted Production of Child Pornography, in violation of 18
22 U.S.C. § 2251(a), (e), the United States would have to prove beyond a reasonable
23 doubt the following elements:
24

- 25 First: that the Defendant intended to engage a minor in sexually explicit
26 conduct for the purpose of making a visual depiction of that conduct; and;
27 Second: that the Defendant engaged in a purposeful act that, in the Eastern
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1 District of Washington, under the circumstances as he believed them to be,
2 amounted to a substantial step towards the commission of the crime and
3 strongly corroborated his criminal intent.

4 The elements of the underlying offense of production of child pornography
5 are as follows:

6 First: the Defendant employed, used, persuaded, induced, enticed, or coerced
7 a minor to take part in sexually explicit conduct, in the Eastern District of
8 Washington, for the purpose of producing a visual depiction of such
9 conduct;

10 Second: at the time of the offense the minor was under the age of eighteen;

11 Third: (a) The Defendant knew or had reason to know that such visual
12 depiction would be transported using any means or facility of interstate or
13 foreign commerce; or

14 (b) The Defendant knew or had reason to know that such visual depiction
15 would be transported in or affecting interstate or foreign commerce; or

16 (c) Such visual depiction was produced using materials that have been
17 mailed or shipped or transported in and affecting interstate or foreign
18 commerce by any means, including by computer; or

19 (d) Such visual depiction was actually transported using any means and
20 facility of interstate and foreign commerce; or

21 (e) Such visual depiction was actually transported in and affecting interstate
22 and foreign commerce.
23

24 5. Factual Basis and Statement of Facts:

25 The United States and the Defendant stipulate and agree that the following
26 facts are accurate; that the United States could prove these facts beyond a
27 reasonable doubt at trial; and these facts constitute an adequate factual basis for
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1 Defendant JUAN CARLOS SANDOVAL-GUERRERO's guilty plea. This
2 statement of facts does not preclude either party from presenting and arguing, for
3 sentencing purposes, additional facts which are relevant to the guideline
4 computation or sentencing, unless otherwise prohibited in this agreement.

5 The investigation into Juan Carlos Sandoval-Guerrero commenced upon a
6 complaint from a mother in Benton County, referred to herein as Victim Mother.
7 She called to express concern regarding interactions her children, Victim B (age 9
8 at the time of the incident) and Victim C (age 11 at the time of the incident), had
9 with a person she believed to be an adult over Xbox.

10 TFO Runge, Homeland Security Investigations, interviewed Victim Mother
11 who explained, on November 1, 2019, she had come home and noticed that there
12 were missed calls from a "Juan" on her son's (Victim C's) phone. When her
13 children got home from school she asked the boys who Juan was, and Victim B
14 responded by saying that he was their friend from Xbox. Later when "Juan" called
15 again, Victim Mother answered the phone and put it on speaker; an adult male
16 (now known to be Defendant) was speaking. Victim Mother asked the adult male
17 if he was Juan and the adult male said that Juan was his son. Victim Mother asked
18 the adult male how old he was, and he said that he was 32. Victim Mother said
19 that Victim B was near and confirmed that the adult male that was speaking on the
20 phone call was the person he knew to be Juan. Victim Mother said that she spoke
21 to both Victim C and Victim B about "Juan" and received information the boys
22 had sent pictures to "Juan."
23

24 TFO Runge reviewed Victim B's phone and located nude or partially nude
25 photographs and video of Victim B. Specifically, the images portrayed Victim B
26 displaying his penis, masturbating his penis with his hand and penetrating his anus
27 with his finger. In some videos, Victim B can be seen wearing a wireless headset
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1 of the type that are typically associated with video game systems like Xbox.
2 During one of the videos Victim B can be heard talking about the points he got on
3 a game while he is masturbating his penis. The photographs and video had
4 associated dates between October 09, 2019 and October 25, 2019.

5 Victim B and Victim C were forensically interviewed. TFO Runge was
6 present for the interviews. Victim C stated that he and Victim B shared one
7 account on Xbox and that they took turns talking to "Juan" over the head set.
8 Victim C also admitted to talking to "Juan" on his phone via an application called,
9 "TextNow." Victim C said that at first their conversations were about the game but
10 that they later turned to "pictures and stuff."

11 Victim B stated he began sending "Juan" nude photos at Juan's request. Juan
12 would offer to buy Victim B in-game purchases on Fortnite (an Xbox game played
13 online). Victim B said that "Juan" asked to video chat with Victim B and Victim B
14 did. During the video chats, Victim B stated that Victim B was asked to
15 masturbate by "Juan". Victim B would go into the bathroom, after his brother
16 Victim C was asleep, and masturbate on camera, as requested.

17 Juan Carlos Sandoval-Guerrero was found to be residing at a specific
18 address in Grandview, WA. On February 6, 2020, TFO Runge obtained a search
19 warrant for that residence, which was executed the same day.
20

21 During the search, many electronic devices were seized. The seized items
22 included two smart phones that were later determined to be Defendant's older
23 phone and his new phone, which he had purchased about one month prior to the
24 search warrant.

25 During the search, Defendant was located. He was subsequently transported
26 to Grandview Police Department for interview. During the interview, which TFO
27 Runge was present for, having waived his *Miranda* rights, Defendant confessed to
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1 contacting Victim B through the video game Fortnite. Defendant admitted that he
2 requested and directed Victim B to produce a number of images and videos that he
3 would use to masturbate.

4 Defendant initially stated that he deleted all images but later admitted that he
5 stored them under his Snapchat Account he had initially maintained on an old
6 phone but later transferred to his new phone. Defendant indicated he maintained
7 the photos under the password protected "For Your Eyes Only" section. Defendant
8 voluntarily opened the "For Your Eyes Only" section on the phone and
9 photographs and video of Victim B could be clearly seen.

10 6. The United States Agrees:

11 The United States Attorney's Office for the Eastern District of Washington
12 agrees not to bring any additional charges against the Defendant based upon
13 information in its possession at the time of this Plea Agreement and arising out of
14 the Defendant's conduct involving illegal activity charged in the Indictment in this
15 case, unless the Defendant breaches this Plea Agreement any time before or after
16 sentencing. The United States also agrees to dismiss the remaining counts of the
17 Indictment, specifically, Attempted Production of Child Pornography, in violation
18 of 18 U.S.C. § 2251 (Count 2).
19

20 7. Effect on Immigration Status:

21 The Defendant recognizes that pleading guilty may have consequences with
22 respect to his immigration status if he is not a citizen of the United States. Under
23 federal law, a broad range of crimes are removable offenses, including the offense
24 to which the Defendant is pleading guilty. Indeed, following conviction, removal is
25 presumptively mandatory. Removal and other immigration consequences are the
26 subject of a separate proceeding, however, and the Defendant understands that
27 while deportation and/or removal appears to be a virtual certainty, no one,
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1 including his attorney or the Court, can predict with absolute certainty the effect of
2 his conviction on his immigration status. The Defendant nevertheless affirms that
3 he wants to plead guilty regardless of any immigration consequences that his plea
4 may entail, even if automatic removal from the United States is a virtual certainty.

5 8. United States Sentencing Guideline Calculations:

6 The Defendant understands and acknowledges that the United States
7 Sentencing Guidelines (hereinafter "U.S.S.G.") are applicable to this case and that
8 the Court will determine the Defendant's applicable sentencing guideline range at
9 the time of sentencing.

10 (a.) Base Offense Levels:

11 The United States and the Defendant agree that the base offense level for
12 Attempted Production of Child Pornography is 32. *See* U.S.S.G. §2G2.1(a), (e).

13 (b.) Specific Offense Characteristics:

14 As it pertains to the Attempted Production of Child Pornography Offense,
15 the Defendant understands the United States intends to argue his base offense level
16 should be increased by the following specific offense characteristics, though the
17 Defendant reserves the right to argue against all specific offense characteristics:

18 The United States intends to argue that the base offense is increased by an
19 additional four (4) levels because the offense involved a minor who had not
20 attained the age of twelve years. *See* U.S.S.G. §2G2.1(a);

21 The United States intends to argue that the base offense is increased by an
22 additional two (2) levels because the offense involved commission of a sexual act.
23 *See* U.S.S.G. §2G2.1(b)(2)(A);

24 The United States intends to argue that the base offense is increased by an
25 additional two (2) levels because the offense involved distribution to the
26 Defendant. *See* U.S.S.G. §2G2.1(b)(3);
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1 The United States intends to argue that the base offense is increased by an
2 additional two (2) levels because the offense involved use of a computer service.
3 See U.S.S.G. §2G2.1(b)(6).

4 (c.) Criminal Livelihood

5 As it pertains to criminal livelihood under Chapter 4B, the parties agree and
6 stipulate the base offense is increased by an additional five (5) levels because the
7 Defendant engaged in a pattern of activity involving prohibited sexual conduct.
8 See U.S.S.G. §4B1.5(b).

9 (d.) Acceptance of Responsibility:

10 If the Defendant pleads guilty and demonstrates a recognition and
11 affirmative acceptance of personal responsibility for the criminal conduct; provides
12 complete and accurate information during the sentencing process; does not commit
13 any obstructive conduct; and accepts this Plea Agreement; the United States will
14 move for a three (3) level downward adjustment in the offense level for the
15 Defendant's timely acceptance of responsibility, pursuant to U.S.S.G. §3E1.1(a)
16 and (b).

17 The Defendant and the United States agree that the United States may at its
18 option and upon written notice to the Defendant, not recommend a three (3) level
19 downward reduction for acceptance of responsibility if, prior to the imposition of
20 sentence, the Defendant is charged or convicted of any criminal offense
21 whatsoever or if the Defendant tests positive for any controlled substance.

22 (e.) Criminal History:

23 The United States and the Defendant understand that the Defendant's
24 criminal history computation is tentative and that ultimately the Defendant's
25 criminal history category will be determined by the Court after review of the
26 Presentence Investigative Report. The United States and the Defendant have made
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1 no agreement and make no representations as to the criminal history category,
2 which shall be determined after the Pre-Sentence Investigative Report is
3 completed.

4 9. Imprisonment:

5 The United States and the Defendant agree to recommend Defendant be
6 sentenced to 15 years of imprisonment.

7 10. Criminal Fines:

8 The United States and the Defendant are free to make whatever
9 recommendation concerning the imposition of a criminal fine that they believe is
10 appropriate. Neither party may withdraw from the Plea Agreement based on the
11 ultimate fine imposed.

12 11. Supervised Release:

13 The United States and the Defendant have no agreement regarding the
14 appropriate term of supervised release. The Defendant understands the United
15 States intends to argue for a lifetime term of supervised release.

16 12. Restitution:

17 The United States and the Defendant agree that restitution is required. *See* 18
18 U.S.C. §§ 2259, 3663A, and 3664. The United States and the Defendant hereby
19 stipulate and agree that pursuant to 18 U.S.C. § 2259(b)(2), the Court shall order
20 restitution for the full amount of the victims' losses in an amount that reflects the
21 defendant's relative role in the causal process that underlies the victim's losses, but
22 which is no less than \$3,000 per victim.

23 For purposes of 18 U.S.C. § 2259, "victim," means the individual harmed as
24 a result of a commission of the crime, including, in the case of a victim who is
25 under 18 years of age, the legal guardian of the victim. The United States and the
26 Defendant also hereby stipulate and agree that the Court shall order full restitution,
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1 as appropriate, to any entity, organization, insurance company, individual(s),
2 and/or medical provider who provided medical services and/or funds related to the
3 treatment of the victims.

4 The Defendant understands and agrees that the Court, in addition to any
5 other penalty, shall order the Defendant to make restitution to any victim of the
6 offense(s), pursuant to 18 U.S.C. § 3663, and the Court may order the Defendant to
7 make restitution to any victim of the offense(s), pursuant to 18 U.S.C. §
8 3663(a)(3), including restitution as to all victims detailed in the discovery received
9 through the date of the instant agreement, whether or not the Defendant enters a
10 plea of guilty to such counts, and whether or not such counts are foregone pursuant
11 to this agreement. With respect to any such victims, the court shall order restitution
12 in an amount that reflects the defendant's relative role in the causal process that
13 underlies the victim's losses, but which is no less than \$3,000.

14 With respect to restitution, the United States and the Defendant agree to the
15 following:

16 a. Restitution Amount and Interest

17 The United States and the Defendant hereby stipulate and agree that,
18 pursuant to 18 U.S.C. §§ 2259, 3663, 3663A and 3664, the Court should order
19 restitution in an amount to be determined at or before sentencing, but which is not
20 less than \$3,000 per victim. The United States and the Defendant agree that
21 interest on this restitution amount, if any, should be waived.

22 b. Payments

23 To the extent that the Court orders restitution, the United States and the
24 Defendant agree that the Court will set a restitution payment schedule based on his
25 financial circumstances. See 18 U.S.C. § 3664(f)(2), (3)(A). Regardless, the
26 Defendant agrees to pay not less than 10% of his net monthly income towards his
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1 restitution obligation.

2 c. Treasury Offset Program and Collection

3 The Defendant understands the Treasury Offset Program (“TOP”) collects
4 delinquent debts owed to federal agencies. If applicable, the TOP may take part or
5 all of the Defendant’s federal tax refund, federal retirement benefits, or other
6 federal benefits and apply these monies to the Defendant’s restitution obligations.
7 *See* 26 U.S.C. § 6402(d); 31 U.S.C. § 3720A; 31 U.S.C. § 3716.

8 The Defendant also understands the United States may, notwithstanding the
9 Court-imposed payment schedule, pursue other avenues to ensure the restitution
10 obligation is satisfied, including, but not limited to, garnishment of available funds,
11 wages, or assets. *See* 18 U.S.C. §§ 3572, 3613, and 3664(m). Nothing in this
12 acknowledgment shall be construed to limit the Defendant’s ability to assert any
13 specifically identified exemptions as provided by law, except as set forth in this
14 Plea Agreement.

15 Until a fine or restitution order is paid in full, the Defendant agrees fully to
16 disclose all assets in which he has any interest or over which he exercises control,
17 directly or indirectly, including those held by a spouse, parent, nominee, or third
18 party. Until such time as the fine or restitution order is paid in full, the Defendant
19 agrees to provide waivers, consents or releases requested by the U.S. Attorney’s
20 Office to access records to verify the financial information.

21 d. Notifications and Waivers

22 The Defendant agrees to notify the Court and the United States of any
23 material change in his economic circumstances (e.g., inheritances, monetary gifts,
24 changed employment, or income increases) that might affect his ability to pay
25 restitution. *See* 18 U.S.C. § 3664(k). This obligation ceases when the restitution is
26 paid-in-full.
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1 The Defendant agrees to notify the United States of any address change
2 within 30 days of that change. *See* 18 U.S.C. § 3612(b)(1)(F). This obligation
3 ceases when the restitution is paid-in-full.

4 The Defendant acknowledges that the Court's decision regarding restitution
5 is final and non-appealable. Neither party may withdraw from the Plea Agreement
6 based on the ultimate amount or restitution ordered.

7 13. Mandatory Special Penalty Assessments:

8 The Defendant agrees to pay the \$100 mandatory special penalty assessment
9 to the Clerk of Court for the Eastern District of Washington, at or before
10 sentencing, pursuant to 18 U.S.C. § 3013 and shall provide a receipt from the Clerk
11 to the United States before sentencing as proof of this payment.

12 Pursuant to the Justice for Victims of Trafficking Act of 2015, upon
13 conviction, unless the Sentencing Court finds the defendant to be indigent, an
14 additional mandatory special assessment of \$5,000 must also be imposed.

15 The United States further reserves its right to request an additional special
16 penalty assessment of no more than \$50,000 pursuant to the Amy, Vicky and Andy
17 Child Pornography Victim Assistance Act of 2018, 18 U.S.C. § 2259A in addition
18 to any other criminal penalty, restitution, or special assessment authorized by law
19 the court shall assess.

20 Neither party may withdraw from the Plea Agreement based on the ultimate
21 special penalty assessment(s) imposed.

22 14. Payments While Incarcerated:

23 If the Defendant lacks the financial resources to pay the monetary
24 obligations imposed by the Court, the Defendant agrees to earn the money to pay
25 toward these obligations by participating in the Bureau of Prisons' Inmate
26 Financial Responsibility Program.
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15. Forfeiture:

The Defendant, JUAN CARLOS SANDOVAL-GUERRERO, agrees to voluntarily forfeit and relinquish all right, title and interest in all assets listed herein to the United States, and hereby agrees to execute any and all forms and pleadings necessary to effectuate such forfeiture of assets, including, but not limited to the following:

- an Iphone 11 with clear case;
- a black cell phone with unicorn breeze case;
- a white X-box, serial number: 054970372916;
- a black X-box, serial number: 002422191317; and,
- a white X-box, serial number: 109759463248.

The Defendant stipulates that he is the sole owner of the assets identified in this Plea Agreement and that no one else has an interest in the assets.

The Defendant acknowledges that the assets listed above that the Defendant is agreeing to forfeit are subject to forfeiture pursuant to 18 U.S.C. § 2253(a) and (b), as property used or intended to be used in any manner or part to commit or to facilitate the commission of Attempted Production of Child Pornography as charged in Count 1 of the Indictment, in violation of 18 U.S.C. § 2251, to which Defendant is pleading guilty. The Defendant agrees to take all steps as requested by the United States to pass clear title to the assets to the United States, and to testify truthfully in any forfeiture proceeding.

The Defendant agrees to hold all law enforcement agents/officers, and the United States, its agents, and its employees harmless from any claims whatsoever arising in connection with the seizure and forfeiture of any asset covered by this agreement.

1 The Defendant waives further notice of any federal, state or local
2 proceedings involving the forfeiture of the seized assets the Defendant is agreeing
3 to forfeit in this Plea Agreement.

4 The Defendant further agrees to waive all constitutional, equitable and
5 statutory challenges in any manner (including direct appeal, habeas corpus, or any
6 other means) to any forfeiture carried out in accordance with this Plea Agreement
7 on any grounds, including that the forfeiture constitutes an excessive fine or
8 punishment. Defendant knowingly and voluntarily waives his right to a jury trial
9 on the forfeiture of the asset(s). Defendant waives oral pronouncement of
10 forfeiture at the time of sentencing, and any defects that may pertain to the
11 forfeiture.

12 16. Additional Violations of Law Can Void Plea Agreement:
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14 The Defendant and the United States agree that the United States may at its
15 option and upon written notice to the Defendant, withdraw from this Plea
16 Agreement or modify its recommendation for sentence if, prior to the imposition of
17 sentence, the Defendant is charged or convicted of any criminal offense
18 whatsoever or if the Defendant tests positive for any controlled substance.

19 17. Appeal Rights:

20 The Defendant understands that he has a limited right to appeal or challenge
21 the conviction and sentence imposed by the Court. The Defendant hereby
22 expressly waives his right to appeal his conviction, any sentence the Court
23 imposes, any special penalty assessments, and any order of supervised release with
24 the exception that the Defendant may appeal only: 1) the procedural and
25 substantive reasonableness of any sentence of incarceration in excess of 22 years
26 (264 months) imprisonment; and, 2) the procedural and substantive reasonableness
27 of any restitution order in excess of \$70,000. The Defendant further expressly
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1 waives his right to file any post-conviction motion attacking his conviction and
2 sentence, including a motion pursuant to 28 U.S.C. § 2255, except one based upon
3 ineffective assistance of counsel based on information not now known by the
4 Defendant and which, in the exercise of due diligence, could not be known by the
5 Defendant by the time the Court imposes the sentence.

6 18. Notice of Sex Offender Registration:

7 The Defendant has been advised and understands, that as a convicted sex
8 offender, under the Sex Offender Registration and Notification Act, a federal law,
9 the Defendant must register and keep the registration current in each of the
10 following jurisdictions: the location of the Defendant's residence, the location of
11 the Defendant's employment; and, if the Defendant is a student, the location of the
12 Defendant's school. Registration will require that the Defendant provide
13 information that includes name, residence address, and the names and addresses of
14 any places at which the Defendant is or will be an employee or a student. The
15 Defendant understands that he must update his registrations not later than three
16 business days after any change of name, residence, employment, or student status.
17 The Defendant understands that failure to comply with these obligations subjects
18 the Defendant to prosecution for failure to register under federal law, 18 U.S.C. §
19 2250, which is punishable by a fine or imprisonment, or both.
20

21 19. Waiver of Physical Presence:

22 The Defendant, JUAN CARLOS SANDOVAL-GUERRERO, by and
23 through this Plea Agreement and pursuant to the CARES Act § 15002(b)(2), Pub.
24 L. No. 116-136 (H.R. 748) (eff. March 27, 2020), and General Order No. 20-101-3
25 (E.D. Wash. Mar. 30, 2020), expressly waives his right to be physically present,
26 see Fed. R. Crim. P. 43(a), and consents to appear by video-teleconferencing for
27 the Defendant's change of plea in the above-captioned case.
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20. Integration Clause:

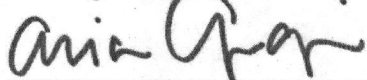
The United States and the Defendant acknowledge that this document constitutes the entire Plea Agreement between the United States and the Defendant, and no other promises, agreements, or conditions exist between the United States and the Defendant concerning the resolution of the case. This Plea Agreement is binding only upon the United States Attorney's Office for the Eastern District of Washington, and cannot bind other federal, state or local authorities. The United States and the Defendant agree that this agreement cannot be modified except in a writing that is signed by the United States and the Defendant.

Approvals and Signatures

The parties acknowledge and agree that this Plea Agreement may be executed by electronic signature, which shall be considered as an original signature for all purposes and shall have the same force and effect as an original signature.

Agreed and submitted on behalf of the United States Attorney's Office for the Eastern District of Washington.

Joseph H. Harrington
Acting United States Attorney



Alison L. Gregoire
Assistant U.S. Attorney

16 March 2021

Date

I have had this Plea Agreement read to me and have carefully reviewed and discussed every part of the agreement with my attorney. I understand and voluntarily enter into this Plea Agreement. Furthermore, I have consulted with my attorney about my rights, I understand those rights, and I am satisfied with the representation of my attorney in this case. No other promises or inducements have

1 been made to me, other than those contained in this Plea Agreement and no one
2 has threatened or forced me in any way to enter into this Plea Agreement. I am
3 agreeing to plead guilty because I am guilty.

4
5 /s Juan Sandoval-Guerrero by JBS with consent
6 JUAN CARLOS SANDOVAL-GUERRERO
7 Defendant

March 30, 2021
Date

8 I have read this Plea Agreement and have discussed the contents of the
9 agreement with my client. The Plea Agreement accurately and completely sets
10 forth the entirety of the agreement between the parties. I concur in my client's
11 decision to plead guilty as set forth in the Plea Agreement. There is no legal reason
12 why the Court should not accept the Defendant's plea of guilty.

13 /s Jeremy B. Sporn
14 Jeremy Sporn
15 Attorney for the Defendant

March 30, 2021
Date